

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

101 Park Avenue  
New York, New York 10178-0061  
Telephone: (212) 696-6000  
Facsimile: (212) 697-1559  
L. P. Harrison 3rd  
Cindi Eilbott Giglio

*Counsel for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**CERTIFICATE OF NO OBJECTION  
UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS  
CLAIMS OBJECTION SCHEDULED FOR HEARING ON JANUARY 28, 2014**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures entered on June 17, 2010 [Docket No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, filed the following omnibus claims objection (the "Claim Objection") with the Court for hearing on January 28, 2014:

Four Hundred Fifty First Omnibus Objection to Claims (Preferred Securities Claims)  
[Docket No. 41670].

2. In accordance with the Second Amended Case Management Order, LBHI established a deadline of January 21, 2014 at 4:00 p.m. (the “Response Deadline”) for the Claim Objection for parties to object or file responses. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claim Objection have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on LBHI’s counsel by any of the holders of the claims included in Exhibit 1 to the Order attached hereto, which includes only the proofs of claim for which the Claim Objection will be granted.

4. Accordingly, LBHI respectfully requests that the proposed order granting the Claim Objection annexed hereto as Exhibit A, which, except for the inclusion of additional language to reference the inclusion of a separate exhibit attached to the proposed order for proofs of claim for which the Claim Objection is adjourned, is unmodified<sup>1</sup> since the filing of the Claim Objection, be entered in accordance with the procedures described in the Second Amended Case Management Order.

---

<sup>1</sup> An additional modification was made to correct a typo in the title of the proposed order.

I declare that the foregoing is true and correct.

Dated: January 22, 2014  
New York, New York

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

By: /s/ L. P. Harrison 3rd  
L. P. Harrison 3rd  
Cindi Eilbott Giglio  
101 Park Avenue  
New York, New York 10178-0061  
(212) 696-6000

*Counsel for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates*

**EXHIBIT A**

**(Proposed Order – Docket No. 41670)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING THE FOUR HUNDRED FIFTY FIRST  
OMNIBUS OBJECTION TO CLAIMS (PREFERRED SECURITIES CLAIMS)**

Upon the four hundred fifty first omnibus objection to claims, dated December 20, 2013 (the “Four Hundred Fifty First Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking a partial disallowance and expungement of the Claims, all as more fully described in the Four Hundred Fifty First Omnibus Objection to Claims; and due and proper notice of the Four Hundred Fifty First Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Fifty First Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Fifty First Omnibus Objection to Claims establish just cause

---

<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Fifty First Omnibus Objection to Claims.

for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Fifty First Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Claims listed on Exhibit 1 annexed hereto are reduced to the amounts listed under the column heading, “Reduced Amounts,” and any amounts in excess of the Reduced Amounts are disallowed and expunged, with prejudice; and it is further

ORDERED that the Plan Administrator has adjourned the hearing on the Four Hundred Fifty First Omnibus Objection to Claims to a date to be determined with respect to the claims listed on Exhibit 2 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2014  
New York, New York

---

UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

**OMNIBUS OBJECTION 451: EXHIBIT 1 - REDUCED BUT NOT ALLOWED CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	ASSERTED AMOUNT	REDUCED AMOUNT
1 DOMINIAK-ERNST, WALTER	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55829	XS0229269856	Undetermined *	284,981.84
2 J.P. MORGAN SUISSE SA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	59849	XS0229269856	\$135,309.00	\$18,985.47
3 J.P.MORGAN SECURITIES LTD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	49690	XS0229269856	\$1,274,676.12	\$170,269.66
4 J.P.MORGAN SECURITIES LTD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	49786	XS0215349357	\$6,805,724.39	\$597,175.60
5 PICTET & CIE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55829	XS0229269856	Undetermined *	39,969.40
TOTAL						\$ 8,215,709.51	\$ 1,111,381.97

\* Plus unliquidated and/or undetermined amounts.

\*\* Only those portions of the claim related to the ISINs listed are subject to this Objection.



**EXHIBIT 2**

**OMNIBUS OBJECTION 451: EXHIBIT 2 - REDUCED BUT NOT ALLOWED CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	ASSERTED AMOUNT	REDUCED AMOUNT
1 CITIGROUP GLOBAL MARKETS, INC.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	56866	XS0215349357	\$11,557,572.83 *	\$1,016,469.10
2 CITIGROUP GLOBAL MARKETS, INC.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	60606	XS0215349357	\$21,603,981.00 *	\$1,932,943.06
3 CITIGROUP GLOBAL MARKETS, INC.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	60608	XS0229269856	\$21,301,500.00 *	\$2,997,705.23
4 CREDIT SUISSE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55829	XS0215349357	Undetermined *	7,369.40
					XS0229269856	Undetermined *	5,382,479.67
						Undetermined	\$5,389,849.07
5 CREDIT SUISSE (MONACO) SAM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55817	XS0229269856	Undetermined *	46,764.20
6 CREDIT SUISSE (UK) LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55816	XS0229269856	Undetermined *	51,960.22
7 CREDIT SUISSE AG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55813	XS0215349357	Undetermined *	101,011.62
					XS0229269856	Undetermined *	181,860.78
						Undetermined	\$282,872.40
8 CREDIT SUISSE SINGAPORE BRANCH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55825	XS0229269856	Undetermined *	63,951.04
TOTAL						\$ 54,463,053.83	\$ 11,782,514.32

\* Plus unliquidated and/or undetermined amounts.

\*\* Only those portions of the claim related to the ISINs listed are subject to this Objection.